

EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

IN RE DEPAKOTE: RHEALYN)
ALEXANDER, et al.,)
Case No.)
Plaintiffs,) 12-52-NJR-SCW
v.) LEAD CONSOLIDATED
CASE)
ABBOTT LABORATORIES INC.,)
Defendants.)

DEPOSITION OF AL C. EDWARDS, M.D.

Monday, October 3, 2016

Greenville, South Carolina

8:59 a.m.

REPORTED BY: Karen K. Kidwell, RMR, CRR

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1 how she responded to those medications, would be a
2 significant factor in terms of what other possible
3 treatment options might have been available to you in
4 January 1999?

5 A. It could have been. You know, I mean,
6 obviously, she could have been treated for a seizure
7 disorder with Dilantin or Phenobarbital or whatever.
8 Those drugs, although they would -- they might
9 address some of the issues she was having, they
10 haven't -- they hadn't really been used in the
11 affective component of people's illness that I'm --
12 with any success. Tegretol may be a little bit --
13 there was some people -- some people that used
14 Tegretol with a -- almost as a dual purpose, but it
15 actually turned out not to be so helpful.

16 Q. All right. Let me ask you this: Do
17 you -- you stand behind your decision to prescribe
18 Depakote for Ms. Burnett's --

19 A. I think it was -- I think it was a good
20 choice for her illness. She wasn't pregnant when we
21 started the drug. Unfortunately, she got pregnant.

22 I -- and the baby had -- evidently, you
23 know, had a neural tube defect. And that's a bad
24 thing. And this lady was a nice lady. And it was an
25 unfortunate thing.

Al C. Edwards, M.D.

1 A. Yeah.

2 Q. You're not currently treating her now,
3 correct?

4 A. No.

5 Q. Is it fair to say that you believe that
6 Depakote was the best choice to treat Ms. Burnett's
7 condition in 1999 -- in January 1999?

8 MS. WILLIAMSON: Object to the form.
9 Vague.

10 THE WITNESS: I think it was. I think, in
11 general, I wouldn't have probably tried her on
12 it if I didn't think it was.

13 BY MR. EVANS:

14 Q. All right. Do you know, Doctor, as you
15 sit here right now, whether or not any other -- you
16 familiar with the term "AED medication"?

17 A. Um-hmm.

18 Q. Yes?

19 A. Antiepileptic.

20 Q. And I'm just going to refer to them as AED
21 medications so I don't have to get tongue tied trying
22 to say antiepilepsy every time. Are you aware
23 whether or not any other AED medications contained a
24 black box warning about potential teratogenic effects
25 in 1999, besides Depakote?

Al C. Edwards, M.D.

1 CERTIFICATE OF REPORTER

2 I, Karen K. Kidwell, Registered Merit
Reporter and Notary Public for the State of South
3 Carolina at Large, do hereby certify:

4 That the foregoing deposition was taken
before me on the date and at the time and location
stated on page 1 of this transcript; that the
5 deponent was duly sworn to testify to the truth, the
whole truth and nothing but the truth; that the
6 testimony of the deponent and all objections made at
the time of the examination were recorded
7 stenographically by me and were thereafter
transcribed; that the foregoing deposition as typed
8 is a true, accurate and complete record of the
testimony of the deponent and of all objections made
9 at the time of the examination to the best of my
ability.

10 I further certify that I am neither related
to nor counsel for any party to the cause pending or
11 interested in the events thereof.

12 Witness my hand this 10th day of October, 2016.

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14

15 _____
Karen K. Kidwell,
Registered Merit Reporter
16 Notary Public
State of South Carolina at Large
17 My Commission expires:
August 21, 2024

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